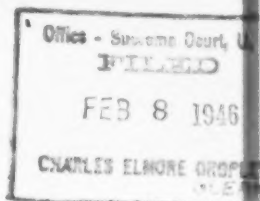


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IN THE
SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1945

Nos. 587, 588, 589.

EDWIN J. CREEL

Petitioner

vs.

ROBERT T. CREEL,

Respondent

PETITION FOR REHEARING
ON DENIAL OF PETITION FOR WRIT OF
CERTIORARI.

EDWIN J. CREEL,
in proper person.

IN THE
SUPREME COURT OF THE UNITED STATES

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Nos. 587, 588, 589.

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Petitioner

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ROBERT T. CREEL,

Respondent

**PETITION FOR REHEARING
ON DENIAL OF PETITION FOR WRIT OF
CERTIORARI.**

*To the Honorable, The Chief Justice and Associate Justices
of the Supreme Court of the United States:*

Your Petitioner, Edwin J. Creel prays that a rehearing or reconsideration be granted to Petitioner's Petitions Nos. 587, 588, and 589, for writs of Certiorari in this cause.

Jurisdiction of the Court to Consider Evidence De Hors the Record as to Unclean Hands of Respondent.

Although Petitioner has found no specific ruling by this Court on the matter; it is Petitioner's understanding that Courts generally consider the Unclean Hands rule, to be a matter of public policy, and one that affects their jurisdiction to act further in the matter; and as such, that unclean hands of a party is a matter that can be considered by this Court on affidavit. Petitioner's authorities to this effect are set out on page 3 of the Reply Brief by Petitioner in this cause.

Th reasons why the Court should grant reconsideration as to denial of the Writ of Certiorari in this cause, are—in Pettitioner's opinion—of great weight, as regards the merits; but they are even more compelling, as to the surrounding facts in this case; and the more serious of which, are indicated in the partly completed Petition to the President, for appointment of a Special Prosecutor, in this cause.

Petitioner therefore files a copy of that as yet incomplete Petition to the President, as a statement of fact in support of this motion for rehearing; and Petitioner files also herewith an affidavit that all matters of fact and of opinion, stated therein, are substantially true as stated.

Petitioner, also includes a statement of certain new matters of fact, in the statement of grounds below; and all of such matters are likewise covered by the same affidavit.

Grounds.

As a partial statement of the grounds for the requested reconsideration: Petitioner respectfully submits the following for the consideration of the Court.

I. For reasons indicated only in part in the said Petition to the President, and in further small part below; it is Petitioner's belief that this case will be plunged almost immediately, by the filing of that Petition, into a nationwide scandal of such proportions, that the Judge Johnson case will seem almost ~~trivial~~ ⁱⁿ ^{the} ^{eyes} ^{of} ^{the} ^{public} in comparison.

It is Petitioner's opinion therefore that this Court should give the most careful consideration, to any possibility, that this Court might seem to have had no concern, as to the **wrong that has been done in this case, during the 13 years of this receivership.**

II. On a strictly legal basis; the major question in this case is as to a **confirmed purchaser's right to an appeal;** from a decree entered during the course of a summary proceeding by the District Court, against the said purchaser, as an alleged defaulter. And obviously, if Petitioner had no right to an appeal, from that order for resale as entered against this Petitioner; then legislative action to supply such a remedy would be imperatively necessary.

III. The necessity for closing up this Petition in time to meet the extension granted; makes it impossible to state the further grounds. Petitioner therefore asks the most careful consideration by the Court, of the statement of fact, as set out in the Petition to the President, which is filed as an Appendix hereto.

Respectfully submitted,

EDWIN P. CREEL.

District of Columbia: ss.

I, Edwin J. Creel, being first duly sworn, according to law, depose and say that I have read Appendix I to this motion for rehearing; and that all matters of fact and of opinion stated therein, I believe to be substantially true as stated.

Signed EDWIN J. CREEL.

Subscribed and sworn to before me this 8th day of Feb., 1946.

R. deB. Waggoner
~~NORMA SPARNELL,~~

Notary Public in and for the
District of Columbia.

My commission expires ~~Jan. 14, 1947.~~

MAY 1, 1950